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COHEN MILSTEIN

August 17, 2020

**MEMO ENDORSED**

VIA ECF

The Honorable Katherine Polk Failla  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Iowa Pub. Emps.' Ret. Sys. et al. v. Bank of Am. Corp. et al.*, No. 17-cv-6221 (KPF)

Dear Judge Failla:

Plaintiffs write to request leave to file under seal their Letter Motion to Compel the Deposition of James Gorman. The motion discusses and attaches as exhibits material the Producing Parties have designated "Confidential" under the Court's Protective Order. *See* ECF No. 150. The Protective Order requires that the parties designate confidential material when they reasonably and in good faith believe that the material constitutes or reveals trade secrets, proprietary business information, non-public personal, client, or customer information concerning individuals or entities, or meets criteria constituting personal data. *See id.* § 2.5. Plaintiffs have not independently verified designations made by Defendants or Third Parties but rely on their designations in requesting leave to file under seal. *See id.* § 9.

Plaintiffs therefore request leave to file their Letter Motion to Compel the Deposition of James Gorman and its exhibits under seal.

Respectfully submitted,

/s/ Michael B. Eisenkraft

Michael B. Eisenkraft  
COHEN MILSTEIN SELLERS & TOLL  
PLLC

/s/ Daniel L. Brockett

Daniel L. Brockett  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

Application GRANTED.

Dated: August 17, 2020  
New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE